

From: [MCCLINCY Matt](#)
To: [Sean Sheldrake/R10/USEPA/US@EPA](#); [BAYUK Dana](#)
Cc: [Mark Ader/R10/USEPA/US@EPA](#); [Chip Humphrey/R10/USEPA/US@EPA](#); [Eric Blischke/R10/USEPA/US@EPA](#); [Kristine Koch/R10/USEPA/US@EPA](#); [ANDERSON Jim M](#)
Subject: RE: GASCO/Siltronic Phase I Report and Phase 2 Sampling_Approach: Source Control Evaluation; EPA comments
Date: 06/01/2007 12:53 PM

Sean,

Thanks for forwarding EPA comments. DEQ completely agrees that the Gasco/Siltronic site is a high priority and justifies broad and aggressive source control. DEQ project staff are working very hard to accomplish this goal. Our priority is to initially cut off the migration of dissolved phase contaminants and potential DNAPL sources at the river. Our focus will subsequently shift to the upland FS which will evaluate remedial options for additional source control measures through source reduction.

It appears you think the subject work plan was written by NW Natural to support upland source control work. It wasn't. The work plan was written to support the Pdx Harbor in-water RI/FS, specifically the LWG's obligation to characterize TZW and assess in-river risk associated with TZW. It appears that you also may not be aware of certain Pdx Harbor in-water RI/FS project elements. In a July 25, 2005 agreement between the LWG and EPA, EPA requested that DEQ provide oversight of the in-water characterization of the deeper groundwater plumes at 4 sites, which included Gasco. DEQ considers the objectives EPA disagrees with (in your 6/10/07 e-mal) and the associated scope-of-work to be consistent with Pdx Harbor RI/FS agreements and objectives which will further support the FS, source control and/or possible early action data needs.

I have noticed that you commonly blind copy parties on some of your e-mails. If you have in this instance, I ask that you forward my response.

Matt McClincy

-----Original Message-----

From: Sheldrake.Sean@epamail.epa.gov [<mailto:Sheldrake.Sean@epamail.epa.gov>]
Sent: Friday, June 01, 2007 9:08 AM
To: MCCLINCY Matt; BAYUK Dana
Cc: Ader.Mark@epamail.epa.gov; Humphrey.Chip@epamail.epa.gov; Blischke.Eric@epamail.epa.gov; Koch.Kristine@epamail.epa.gov; Sheldrake.Sean@epamail.epa.gov
Subject: GASCO/Siltronic Phase I Report and Phase 2 Sampling_Approach: Source Control Evaluation; EPA comments

Matt, Dana,

Thank you for the review opportunity. While EPA certainly agrees there is design information to be collected to put together the GASCO/Siltronic source control effort, we disagree with the following goals for this work listed on pages 1-2 of the document:

1.
How_the_vertical_and_lateral_extent_of_chemicals_in_groundwater_beneath_the_river_and_transition_zone_water_may_be_related_to_chemical_concentrations_measured_in_Introduction__Phase_I_Report_and_Phase_2_Sampling_Approach__ May_2007_Gasco_Siltronic_Groundwater_Source_Evaluation_2_000029_02_

upland_groundwater.____This_will_be_accomplished_through_sampling_and_laboratory_testing_of_offshore_groundwater_and_transition_zone_water.____

2.

How_groundwater_and_transition_zone_water_concentrations_may_be_related_to_direct_historical_deposition_of_materials_in_the_river.____This_will_be_accomplished_through_sampling_and_chemical_analysis_of_bulk_sediment_and_observations_of_waste_material_potentially_present_in_those_river_sediments.____

3.

Determine_if_the_chemical_concentrations_in_the_biologically_active_transition_zone_water_in_navigation_channel_sediments_have_been_directly_impacted_by_historical_deposition_of_waste_materials_in_the_river.____This_will_be_accomplished_through_collection_of_transition_zone_water_and_sediment_for_chemical_analyses.____

EPA believes this site justifies broad, aggressive source control as soon as possible--and that there is no need to further establish river impact of the plumes from Siltronic/GASCO or differentiate relative contributions of sediment and upland materials to substantiate this fact. In 10-20 years, TZW data will certainly be useful in determining what benefit upland source control and in river activities have made towards cleanup goals, but now is the time to focus exclusively on information needed to design an aggressive source control system at one of our highest priority sites on the river.

Please let me know if you'd like to discuss further.

S

Sean Sheldrake

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<http://yosemite.epa.gov/r10/oea.nsf/webpage/dive+team>

<http://yosemite.epa.gov/r10/cleanup.nsf/sites/ptldharbor>

Deliveries: 9th floor mailroom

Visitors: Check-in @ PERC / Service Center on 12th floor

<http://yosemite.epa.gov/r10/extaff.nsf/webpage/Visiting+Our+Offices?OpenDocument>